

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

Case No.: 1:24-cv-21226-RUIZ/TORRES

**DR. EDWIN A. HERNANDEZ, and EGLA
CORP.,**

JURY TRIAL DEMANDED

Plaintiffs,

v.

**STINGRAY GROUP INC. f/k/a
STINGRAY DIGITAL GROUP, INC.,
STINGRAY MUSIC USA, INC., MOOD
MEDIA LLC f/k/a MOOD MEDIA
CORPORATION, AT&T ENTERPRISES,
LLC f/k/a AT&T Corp., MILLICOM
INTERNATIONAL SERVICES, LLC,
BLUE STREAM COMMUNICATIONS,
LLC dba BLUE STREAM FIBER, and
DOES 1-100,**

Defendants.

**NOTICE OF FILING PLAINTIFFS' EDWIN HERNANDEZ AND EGLA CORP
OPPOSITION TO MOTION TO WITHDRAW**

The law firms of Jeffer Mangels Butler & Mitchell LLP and GrayRobinson P.A. ("The Law Firms"), as an accommodation to the court and Plaintiffs, hereby file Opposition to Motion to Withdraw, served by Plaintiffs, Dr. Edwin A. Hernandez and EGLA Corp. ("Plaintiffs"), upon counsel earlier this morning. Plaintiffs have advised The Law Firms that this motion had been or would be filed with the Court. However, in order to bring it to the Court's attention in a timely matter, the law firms hereby file this opposition.

Dated: June 5, 2025

Respectfully submitted,

By: /s/ Elio F. Martinez, Jr.

Elio F. Martinez, Jr.

Florida Bar No. 501158

elio.martinez@gray-robinson.com

Francesca Russo

Florida Bar No. 174912

francesca.russo@gray-robinson.com

GRAY|ROBINSON, P.A.

333 S.E. 2nd Avenue, Suite 3200

Miami, Florida 33131

Tel: (305) 416-6880

Fax: (305) 416-6887

- And -

/s/ Gregory S. Cordrey

Gregory S. Cordrey (*admitted pro hac vice*)

gcordrey@jmbm.com

Stanley M. Gibson

Stanley M. Gibson (*admitted pro hac vice*)

sgibson@jmbm.com

Lena Streisand (*admitted pro hac vice*)

lstreisand@jmbm.com

Celine Ohanian (*admitted pro hac vice*)

cohanian@jmbm.com

**JEFFER MANGELS BUTLER &
MITCHELL LLP**

1900 Avenue of the Stars, 7th Floor

Los Angeles, California 90067

Tel: (310) 203-8080

Fax: (310) 203-0567

*Counsel for Plaintiffs Edwin A. Hernandez
and EGLA CORP.*

CERTIFICATE OF SERVICE

I hereby certify that on June 5, 2025, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties either via transmission of Notice of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

By: /s/ Elio F. Martinez, Jr.
Elio F. Martinez

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

Case No.: 1:24-cv-21226-RAR

**DR. EDWIN A. HERNANDEZ, and EGLA
CORP.,**

JURY TRIAL DEMANDED

Plaintiffs,

v.

**STINGRAY GROUP INC. f/k/a
STINGRAY DIGITAL GROUP, INC.,
STINGRAY MUSIC USA, INC., MOOD
MEDIA LLC f/k/a MOOD MEDIA
CORPORATION, AT&T ENTERPRISES,
LLC f/k/a AT&T Corp., MILLICOM
INTERNATIONAL SERVICES, LLC,
BLUE STREAM COMMUNICATIONS,
LLC dba BLUE STREAM FIBER, and
DOES 1-100,**

Defendants.

_____ /

OPPOSITION TO MOTION TO WITHDRAW

1. **JMBM made false statment Regarding Depositions for this case**

Jeffer Mangels Butler & Mitchell LLP and GrayRobinson, P.A. omits in the “Motion to Withdraw” several important facts:

- As of May 30th, 2025, No party had paid JAMS (mediator) an email form mediator includes Stingray, MOOD MEDIA, and other counsel, **see Exhibit A**. EGLA CORP submitted payment on June 3rd, 2025 (See **Exhibit H**)
- Dr. Edwin Hernandez proposed to JMBM to let defendants that deposition of both Dr. Edwin Hernandez and Dr. Alcides Hernandez could be done via Zoom, as early as the week of May 22nd (See **Exhibit B**). This proposal was rejected by JMBM, as they said Zoom depositions were not available, despite being notified that Mr. Hartman’s deposition was going to be via Zoom (See **Exhibit F**). Why via zoom?
 - Dr. Edwin Hernandez have been taking care of Dr. Alcides Hernandez and Reina Gladys Hernandez, founders, and owners of EGLA CORP given their age, 75 and 80 years old, and his parents.
 - Dr. Edwin Hernandez communicated to JMBM that, Dr. Alcides Hernandez was recently diagnosed with pulmonary fibrosis and that he was ongoing treatment with a Pneumologist. Treatment helps him breath, although his oxygen levels are below normal. Fibrosis is not curable **See Exhibit D**,
 - Dr. Edwin and Dr. Alcides Hernandez can do the deposition anytime as agreed with Defendant but via ZOOM and take into consideration my father’s illness. ALAVI’s attorneys are very aggressive and show no consideration for people, and under the agreement that his deposition will be done with respect and consideration for Dr. Alcides well-being as a priority (**See Exhibit D.**)

2. **EGLA CORP looses trust on JMBM**

- On May 19th, 2025, the 1st expert report exchange date was set by this court, although as of May 20th, 2025, the Judge extended such deadline to June 2nd, 2025. JMBM made plaintiff’s experts work around the clock to meet the May 19th, 2025 deadline. However at the night of May 19th, 20245, only EGLA CORP and Dr. Edwin Hernandez were **the only parties** that served expert reports for the case, no other reports were shared by defendants. **This was unacceptable**, as clearly ALAVI, Duane Morris, and Sterne Kessler were aware that they did not have to submit any reports. JMBM told Dr. Edwin Hernandez that since no extensions were granted, all reports were going to be exchanged by all parties, which was false, as only plaintiff did

- As of June 3rd, 2025, Plaintiff have not even seen a redacted version of the technical expert report, nor the damages expert report, from the 1st exchange nor from the 2nd exchange.
- Hence, upon the evident problems that raised with JMBM on May 19th, 2025, Dr. Edwin Hernandez spoke with the board of EGLA CORP, which is also his family, and we decided to terminate JMBM. Dr. Edwin Hernandez contacted JMBM and made it clear that no more payments were going to be made, as there was a misalignment between the JMBM firm interests and EGLA CORP's interest, despite having paid thousands of dollars already.
- Additionally, I was notified via phone call by Greg Cordrey that as of May 27th, 2025 no more work was going to be done by the firm, and I had to find a new firm, which Dr. Hernandez started already, and requested JMBM to please wait until new attorneys' are informed, and then withdraw. JMBM filed the motion to withdraw regardless of that request.
- This loss of trust was enhanced when Mr. Cordrey in a phone call asked Dr. Edwin Hernandez to oppose or not this motion without disclosing the contents, which was verbally opposed, and now opposed in writing herein.
- However, despite first stating that no more work was going to be done by JMBM, on May 28th, 2025, JMBM interacted with ALAVI and apparently agreed to STINGRAY submit a brief to the IPR courts on Dr. Hernandez' patents. The same day, via e-mail, Dr. Hernandez contacted JMBM and stated that their firm was NOT authorized to do any more decisions on behalf of EGLA CORP and Dr. Hernandez (See Exhibit C). Despite these requests, JMBM has been pushing for ALAVI to file a brief with the PTAB and I ignore what the plans are there.
- ALAVI on the other hand showed their lack of ethics by contacting the withdrawing firm, JMBM, and requested to file a brief with the USPTO and the PTAB.

3. Regarding Funding for Attorneys

- JMBM was aware that EGLA CORP had located a litigation funding partner, which JMBM met over Zoom and exchanged emails. The litigation founder requested a) Attorney' budget and b) Damages estimates. Quickly a attorney budget was received, however for weeks, the damages estimate was requested was never received (See Exhibit E)
- Hence, these events made EGLA CORP's board to conclude that our lawyers at JMBM were no longer acting to protect our interest and had to be immediately terminated, however for unknown reasons they appear to keep working with defendants.

4. **PAYMENTS TO JMBM HAVE BEEN SUBSTANTIAL**

- Dr. Edwin Hernandez and EGLA CORP have already paid over \$591K and \$78K to JMBM and Gray Robinson respectively in legal fees. EGLA CORP was put on weekly payments, that were due every Friday or Monday. Dr. Hernandez has been part of 50+ IP cases, deposed 50+ times, testified at trial, and even firms like “Intellectual Ventures” with a billion dollars balance sheets, take months to pay for their legal fees, which is customary in the industry.
- EGLA CORP and Dr. Hernandez are not a multi-million-dollar corporation but with sacrifice and frugality our company has been capable to fund this litigation for more than a year. EGLA CORP and Dr. Hernandez will defend our innovations, as in all businesses, sometimes you are in read, but times change and thing turn around.

5. **DAMAGES EXPERT PROBLEMS**

- Dr. Edwin Hernandez and EGLA CORP hired Walt Bratic., Dr. Edwin A. Hernandez has even been praised by Walt Bratic, who has worked with him in many cases defining damages models and other doctrines on damages for several clients.
- Walt Bratic and his firm said that they had a conflict with ALAVI, as one of the sons of Mr. Masood Anjom, attorney on the case, began work for Bratic’s firm in Texas. I was told by Mr. Bratic that his son was going to be kept “isolated” form the case, and that despite Mr. Bratic having a prior working relationship with ALAVI, that was not going to be an issue (**Exhibit G**).
- On June 2nd, 2025, Dr. Edwin Hernandez upon request by Stingray counsel submitted a Damages and Technical Expert Report, hence Walt Bratic withdrawal has no impact on the case, as Dr. Edwin Hernandez will act as its own Damages Expert, providing a Georgia Pacific Factor’s analysis on patents and trade secret damages. As I said before, as of today, not even an estimate on damages was received by Mr. Bratic.
- EGLA CORP is a family-owned business has suffered from all the expensive unresponsive actions of defendants, especially by Stingray, that to this date has shown no data on profits, many questions on technical and software related features, and many more issues that are designed to drain EGLA CORP’s accounts.
- I was advised by both JMBM and Gray Robinson that, the rules set by discovery do not allow filing of briefs, hence EGLA has not file briefs, but obviously, all these discovery hearings that the court has ordered have no briefs from EGLA CORP and Dr. Hernandez.
- We want our date in court and will have a legal team ready for October, even if Damages are determined by the court.

CONCLUSION

- EGLA CORP and Dr. Edwin A. Hernandez opposes JMBM and Gray Robinsons withdrawal unless is done under the following conditions.
 - Full refund of all fees paid by EGLA CORP to JMBM and Gray Robison due within a week,
 - This court to order all pending invoices are considered paid to JMBM and Gray Robinson,
 - Request ALAVI and JMBM to remove any submissions to the PTAB and attach a copy of this opposition to the motion to withdraw.
 - The court to decide what to do, whether to authorize JMBM and Gray Robison, to attend on June 5th, 2025 discovery hearing or not.
- A continuance of 0 days is necessary as Dr. Edwin Hernandez will act pro-se,
- EGLA CORP and Dr. Edwin A. Hernandez will handle all defendant's depositions via ZOOM
- EGLA CORP and Dr. Edwin A. Hernandez will hire additional counsel for trial, by June 22nd, 2025, and.
- Dr. Edwin A. Hernandez will replace Mr. Bratic as Damages Expert, and had already served an expert report on June 2nd, 2025

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'E.A. Hernandez', is written over a horizontal line.

Dr. Edwin A. Hernandez

June 3rd, 2025

DECLARATION OF DR. EDWIN A HERNANDEZ

6. I took my father to a CT Scan and Spirometry to the “Honduras Medical Center” (HMC) in Tegucigalpa around May 8th, 2025.

7. Dr. Mario Lanza, Pneumologist at the HMC determined after several visits around end of April and beginning of May 15th, 2025 gave him the news that Fibrosis was detected in his lungs and that breathing oxygenation was lower than normal.

8. Upon the review of the analysis, my family took him to other physicians and studied the possibility to start treatment with several medication with severe side effects in the liver function.

9. We notified JMBM about his health condition and requested a ZOOM deposition as it was notified to us that Mr. David Hartmann’s deposition was going to be done via ZOOM.

10. I also warrant that:

- (a) Exhibit A, Letter from JAMS (mediators) to all parties, not only EGLA
- (b) Exhibit B, Letter sent to JMBM stating any date for a deposition,
- (c) Exhibit C, Notification to JMBM that they are not authorized to act,
- (d) Exhibit D, Notification to JMBM that Dr. Alcides Hernandez has fibrosis,
- (e) Exhibit E, Notification to JMBM and Walt Bratic that a damages estimate is expected,
- (f) Exhibit F, Notification by JMBM that depositions can be done via ZOOM,
- (g) Exhibit G, Walt Bratic and conflicts with ALAVI
- (h) Exhibit H, Payment to JAMS (Mediator)

11. Exhibits A -H are true PDF prints from emails and documents present in my laptop.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: June 3rd, 2025

A handwritten signature in black ink, appearing to read 'E. A. Hernandez', written over a horizontal line.

Dr. Edwin A. Hernandez

CERTIFICATE OF SERVICE

I hereby certify that on June 3rd 2025, I mailed the foregoing with the Clerk of the Court by using FEDEZ. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties via email transmission.

/s/ Dr. Edwin A. Hernandez

Dr. Edwin A. Hernandez

EXHIBIT A

Subject: RE: Hernandez, Edwin A., et al. vs. Stingray Music USA, Inc., et al. - JAMS Ref No. 1220076593
Date: Friday, May 30, 2025 at 2:26:14 PM Central Standard Time
From: Tyree Lewis <TLewis@jamsadr.com>
To: edwinhm@gmail.com <edwinhm@gmail.com>, aalavi@aatriallaw.com <aalavi@aatriallaw.com>, danaipakos@aatriallaw.com <danaipakos@aatriallaw.com>, jchen@aatriallaw.com <jchen@aatriallaw.com>, cfloresjones@aatriallaw.com <cfloresjones@aatriallaw.com>, sjugle@aatriallaw.com <sjugle@aatriallaw.com>, mmcbride@aatriallaw.com <mmcbride@aatriallaw.com>, dbanker@bushross.com <dbanker@bushross.com>, hwgurland@duanemorris.com <hwgurland@duanemorris.com>, AESnedeker@duanemorris.com <AESnedeker@duanemorris.com>, msyungwirth@duanemorris.com <msyungwirth@duanemorris.com>, elio.martinez@gray-robinson.com <elio.martinez@gray-robinson.com>, francesca.russo@gray-robinson.com <francesca.russo@gray-robinson.com>, gxc@jmbm.com <gxc@jmbm.com>, sgibson@jmbm.com <sgibson@jmbm.com>, cohanian@jmbm.com <cohanian@jmbm.com>, LStreisand@jmbm.com <LStreisand@jmbm.com>, ahenry@riveromestre.com <ahenry@riveromestre.com>, jmestre@riveromestre.com <jmestre@riveromestre.com>, edwinhm@gmail.com <edwinhm@gmail.com>
CC: aflowers@bushross.com <aflores@bushross.com>, nmcastillo@DuaneMorris.com <nmcastillo@DuaneMorris.com>, sj2@jmbm.com <sj2@jmbm.com>
Priority: High
Attachments: image001.png, image002.png, Retainer - Rivero Mestre LLP.pdf, Retainer - Dr. Edwin A. Hernandez.pdf, JAMS Wire Instructions - ACH.pdf, W-9 2025.pdf

Counsel,

I am reaching out again regarding the attached Invoices that remain unpaid. Can you provide me with status of payment?

Best,



Tyree Lewis
Case Coordinator
P: 310-309-6212
TLewis@jamsadr.com

555 West 5th Street, 32nd Floor
Los Angeles, CA 90013
www.jamsadr.com

f in X

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From: Tyree Lewis

Sent: Friday, May 23, 2025 1:28 PM

To: edwinhm@gmail.com; aalavi@aatriallaw.com; danaipakos@aatriallaw.com; jchen@aatriallaw.com; cfloresjones@aatriallaw.com; sjugle@aatriallaw.com; mmcbride@aatriallaw.com; dbanker@bushross.com; hwgurland@duanemorris.com; AESnedeker@duanemorris.com; msyungwirth@duanemorris.com; elio.martinez@gray-robinson.com; francesca.russo@gray-robinson.com; gxc@jmbm.com; sgibson@jmbm.com; cohanian@jmbm.com; LStreisand@jmbm.com; ahenry@riveromestre.com; jmestre@riveromestre.com; edwinhm@gmail.com

Cc: aflowers@bushross.com; nmcastillo@DuaneMorris.com; sj2@jmbm.com

Subject: RE: Hernandez, Edwin A., et al. vs. Stingray Music USA, Inc., et al. - JAMS Ref No. 1220076593

Importance: High

Counsel,

I am following up on the attached Invoices that remain unpaid. Can you provide me with status of payment?

Best,



Tyree Lewis

Case Coordinator

P: 310-309-6212

TLewis@jamsadr.com

555 West 5th Street, 32nd Floor
Los Angeles, CA 90013
www.jamsadr.com

f in X

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From: Tyree Lewis

Sent: Tuesday, April 15, 2025 10:51 AM

To: edwinhm@gmail.com; aalavi@aatriallaw.com; danaipakos@aatriallaw.com; jchen@aatriallaw.com; cfloresjones@aatriallaw.com; sjugle@aatriallaw.com; mmcbride@aatriallaw.com; dbanker@bushross.com; hwgurland@duanemorris.com; AESnedeker@duanemorris.com; msyungwirth@duanemorris.com; elio.martinez@gray-robinson.com; francesca.russo@gray-robinson.com; gxc@jmbm.com; sgibson@jmbm.com; cohanian@jmbm.com; LStreisand@jmbm.com; ahenry@riveromestre.com; jmestre@riveromestre.com; edwinhm@gmail.com

Cc: aflowers@bushross.com; nmcastillo@DuaneMorris.com; sj2@jmbm.com

Subject: RE: Hernandez, Edwin A., et al. vs. Stingray Music USA, Inc., et al. - JAMS Ref No. 1220076593

Dear Counsel,

A reminder of the attached invoices that are due in the above-referenced matter.

You may submit payment via any of the following methods:

- Mail to JAMS - Attn: Lynne Hart, P.O. Box 845402, Los Angeles, CA 90084. Include a copy of the invoice with your payment. Absent an invoice, please include the JAMS reference number in the memo line;
- Electronically by clicking the "click here to pay" link at the bottom of the invoice, which allows you to pay by credit card (subject to a processing fee), e-check, or ACH; or
- Electronically by wire transfer following the attached instructions.

Please contact the Case Manager, O. Montealegre (OMontealegre@jamsadr.com) if you have any questions.

Best,



Tyree Lewis

Case Coordinator

P: 310-309-6212

Tlewis@jamsadr.com

555 West 5th Street, 32nd Floor
Los Angeles, CA 90013
www.jamsadr.com



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From: Tyree Lewis

Sent: Wednesday, February 19, 2025 9:24 AM

To: edwinhm@gmail.com; aalavi@aatriallaw.com; danaipakos@aatriallaw.com; jchen@aatriallaw.com; cfloresjones@aatriallaw.com; sjuggle@aatriallaw.com; mmcbride@aatriallaw.com; dbanker@bushross.com; hwgurland@duanemorris.com; AESnedeker@duanemorris.com; msyungwirth@duanemorris.com; elio.martinez@gray-robinson.com; francesca.russo@gray-robinson.com; gxc@jmbm.com; sgibson@jmbm.com; cohanian@jmbm.com; LStreisand@jmbm.com; ahenry@riveromestre.com; jmestre@riveromestre.com; ueverett@sternekessler.com; mspecht@sternekessler.com; jtuminar@sternekessler.com; edwinhm@gmail.com

Cc: aflowers@bushross.com; nmcastillo@DuaneMorris.com; sj2@jmbm.com

Subject: Hernandez, Edwin A., et al. vs. Stingray Music USA, Inc., et al. - JAMS Ref No. 1220076593

Dear Counsel,

Please find attached the invoices that are due in the above-referenced matter.

You may submit payment via any of the following methods:

- Mail to JAMS - Attn: Lynne Hart, P.O. Box 845402, Los Angeles, CA 90084. Include a copy of the invoice with your payment. Absent an invoice, please include the JAMS reference number in the memo line;
- Electronically by clicking the "click here to pay" link at the bottom of the invoice, which allows you to pay by credit card (subject to a processing fee), e-check, or ACH; or
- Electronically by wire transfer following the attached instructions.

Please contact the Case Manager, Anne Lieu (Alieu@jamsadr.com) if you have any questions.

Best,



Tyree Lewis

Case Coordinator

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Direct: 310-309-6212

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EXHIBIT B

Subject: Re: Hernandez, et al. v. Stingray Group Inc., et al | Service [JMBM-LA.84711.0001]
Date: Tuesday, May 20, 2025 at 4:59:17 PM Central Standard Time
From: Edwin Hernandez <edwinhm@gmail.com>
To: Lena Streisand <LStreisand@jmbm.com>
CC: Stan M. Gibson <SMG@jmbm.com>, Gregory Cordrey <GCordrey@jmbm.com>

We can do my depo remote via zoom. next week if needed, we can have my father also the week after as he has been using some medication for now and although fibrosis is not curable I don't know what kind of unethical pressures will be given to them

On Tue, May 20, 2025, 15:55 Lena Streisand <LStreisand@jmbm.com> wrote:

Hi Dr. Hernandez,

We're sorry to hear that and hope Alcides is okay.

We will need to provide Stingray with a date for Alcides' deposition, but we can move the deposition to later in June or the first week in July, if necessary. If Alcides' health does not improve by that time, we can explore our options, such as filing a protective order, but that would require medical documentation and has other potential implications. We think it's best at this time to provide a later date and go from there. Further, the deposition can take place in Miami or in another location that is easier for Alcides. Please let us know what location he prefers.

Additionally, can you please provide us with your availability in June to be deposed in Miami for two days? Your deposition will include one day on trade secrets-related topics and another day on patent-related topics. I've attached the notices again here. Please provide us all 2-day blocks that you are available so that we can work on scheduling with our team and defendants.

We will also need to schedule at least two prep sessions before your deposition. The first session can be by Zoom but we generally prefer to do the second session in person the day before the deposition.

Thank you,

Lena

Lena Streisand | Associate

Jeffer Mangels Butler & Mitchell LLP | JMBM
[1900 Avenue of the Stars, 7th Floor, Los Angeles, CA 90067](#)
D: (310) 785-5398 | F: (310) 203-0567 | E: LStreisand@JMBM.com

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From: Edwin Hernandez <edwinhm@gmail.com>
Sent: Friday, May 16, 2025 8:49 AM
To: Lena Streisand <LStreisand@jmbm.com>
Cc: Stan M. Gibson <SMG@JMBM.com>; Gregory Cordrey <GCordrey@JMBM.com>
Subject: Re: Hernandez, et al. v. Stingray Group Inc., et al | Service

My dad is in treatment for Lung Fibrosis, I don't think he can talk too much. He is going thru CT scans and figuring out medications, and possibly finding later.

Best Regards,

Edwin

From: Lena Streisand <LStreisand@jmbm.com>
Date: Friday, May 16, 2025 at 9:41 AM
To: Edwin Hernandez <edwinhm@gmail.com>
Cc: "Stan M. Gibson" <SMG@JMBM.com>, Gregory Cordrey <GCordrey@JMBM.com>
Subject: FW: Hernandez, et al. v. Stingray Group Inc., et al | Service

Hi Dr. Hernandez,

Please see attached Stingray's notice of deposition of Alcides Hernandez for June 2 in Miami. Please let us know whether he is available on this date.\

Thank you,

Lena

Lena Streisand | Associate

Jeffer Mangels Butler & Mitchell LLP | JMBM
[1900 Avenue of the Stars, 7th Floor, Los Angeles, CA 90067](#)
D: (310) 785-5398 | **F:** (310) 203-0567 | **E:** LStreisand@JMBM.com

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From: Heather Padron <Hpadron@atriallaw.com>

Sent: Wednesday, May 14, 2025 1:57 PM

To: elio.martinez@gray-robinson.com; francesca.russo@gray-robinson.com; Gregory Cordrey <GCordrey@JMBM.com>; Stan M. Gibson <SMG@JMBM.com>; Celine Ohanian <COhanian@jmbm.com>; Lena Streisand <LStreisand@jmbm.com>; Marissa Sommer <MSommer@jmbm.com>; Itzi Munoz <IMunoz@jmbm.com>; Jessica.Santana@gray-robinson.com; lfowler@bushross.com; Lauren Watt <lwatt@sternekessler.com>; tdutton@sternekessler.com; Paige Cloud <pcloud@sternekessler.com>; Marissa Sommer <MSommer@jmbm.com>

Cc: SRG003-AAteam <SRG-AAteam@atriallaw.com>; ahenry@riveromestre.com; jmestre@riveromestre.com; dbanker@bushross.com; ueverett@sternekessler.com; mspecht@sternekessler.com; jtuminar@sternekessler.com; hwgurland@duanemorris.com; aesnedeker@duanemorris.com; MSYungwirth@duanemorris.com; DM-ATT-Hernandez@duanemorris.com

Subject: Hernandez, et al. v. Stingray Group Inc., et al | Service

Counsel,

Please see attached for service Defendants' Notice of Deposition Under Rule 30(B)(1).

Thank you,

Heather Padron

ALAVI & ANAIPAKOS PLLC, *Paralegal*

609 Main Street, Suite 3200

Houston, Texas 77002

T 713.751.2374 | F 713.751.2341 | W atriallaw.com

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EXHIBIT C

Subject: Re: Stingray Group, et al. v. Dr. Edwin A. Hernandez- Mondragon [IPR2025-00349–51] | Additional Briefing re Discretionary Denial
Date: Wednesday, May 28, 2025 at 9:14:00 PM Central Standard Time
From: Edwin Hernandez <edwinhm@gmail.com>
To: Gregory Cordrey <GCordrey@JMBM.com>
CC: Stan M. Gibson <SMG@JMBM.com>
BCC: Dan Ravicher <dan@zeisler-law.com>
Attachments: image001.png

Hi Greg,

Please notify ALAVI that you are no longer representing me, and that you are no longer authorized to make any decisions on my behalf for this case. Once new counsel agreements are finalized, ALAVI can contact him/her as soon as I hire them. Also, please notify Mr. Wyde that their approach to you is highly unethical, as he saw that you withdrew already.

Instead, I will request new counsel to file a brief to [IPR2025-00349–51] showing this manipulative and unethical behavior to the PTAB, and request denial for not only presenting wrong facts, but being unethical and look for sanctions.

Best Regards,

Edwin

From: Gregory Cordrey <GCordrey@JMBM.com>
Date: Wednesday, May 28, 2025 at 5:45 PM
To: Edwin Hernandez <edwinhm@gmail.com>
Cc: "Stan M. Gibson" <SMG@JMBM.com>
Subject: FW: Stingray Group, et al. v. Dr. Edwin A. Hernandez- Mondragon [IPR2025-00349–51] | Additional Briefing re Discretionary Denial

Edwin,

In the email below, Stingray's IPR counsel is asking if you (patent owner) will oppose their request to seek leave to file a 2-page brief on the affect of the withdrawal motion filed today.

Here is how we see the two options:

1. Not to oppose as opposing makes you look like you are trying to hide this from the Board as either way they will be contacting the Board and informing them about the motion. Also, two pages is not much, and we can argue in response that the requested 30-day continuance even if granted does not materially change any of the prior *Fintiv* analysis.
2. Oppose the request and take the position that nothing has changed unless and until the Court acts and then the parties can address the specific relief, if any, granted by the Court and its impact on the *Fintiv* factors.

We suggest option 1 – agreeing not to oppose, but please let us know your thoughts?

Thanks,
Greg

Gregory S. Cordrey | Partner

Jeffer Mangels Butler & Mitchell LLP | JMBM

3 Park Plaza, Suite 1100, Irvine, CA 92614

D: (949) 623-7236 | **M:** (714) 743-0444 | **E:** GCordrey@JMBM.com

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From: Joshua Wyde <JWyde@atriallaw.com>

Sent: Wednesday, May 28, 2025 3:49 PM

To: Gregory Cordrey <GCordrey@JMBM.com>; Stan M. Gibson <SMG@JMBM.com>

Cc: IPR2025-00351 <IPR2025-00351@atriallaw.com>; IPR2025-00349 <IPR2025-00349@atriallaw.com>; IPR2025-00350 <IPR2025-00350@atriallaw.com>; Marissa Sommer <MSommer@jmbm.com>; Masood Anjom <MAnjom@atriallaw.com>; Michael McBride <MMcBride@atriallaw.com>

Subject: Stingray Group, et al. v. Dr. Edwin A. Hernandez- Mondragon [IPR2025-00349–51] | Additional Briefing re Discretionary Denial

Counselors,

Given the attached motion plaintiff's counsel filed in the District Court today, Patent Owner is going to again request permission to file two additional pages of briefing regarding how the development affects the *Fintiv* analysis in the above referenced IPRs. We are amenable to Petitioner having the same number of pages in response. Given the relatively short time before an institution decision is expected in the IPRs, we will be filing the request by the end of business tomorrow. Please let us know if you will oppose the request. If you think a phone call would be useful, please let us know your availability tomorrow.

JoshuaWyde

ALAVI & ANAIPAKOS PLLC, OF COUNSEL

T [713.751.2365](tel:713.751.2365) | F [713.751.2341](tel:713.751.2341) | W atriallaw.com

EXHIBIT D

Subject: Re: Hernandez, et al. v. Stingray Group Inc., et al | Service
Date: Friday, May 16, 2025 at 9:48:59 AM Central Standard Time
From: Edwin Hernandez <edwinhm@gmail.com>
To: Lena Streisand <LStreisand@jmbm.com>
CC: Stan M. Gibson <SMG@JMBM.com>, Gregory Cordrey <GCordrey@JMBM.com>

My dad is in treatment for Lung Fibrosis, I don't think he can talk too much. He is going thru CT scans and figuring out medications, and possibly finding later.

Best Regards,
Edwin

From: Lena Streisand <LStreisand@jmbm.com>
Date: Friday, May 16, 2025 at 9:41 AM
To: Edwin Hernandez <edwinhm@gmail.com>
Cc: "Stan M. Gibson" <SMG@JMBM.com>, Gregory Cordrey <GCordrey@JMBM.com>
Subject: FW: Hernandez, et al. v. Stingray Group Inc., et al | Service

Hi Dr. Hernandez,

Please see attached Stingray's notice of deposition of Alcides Hernandez for June 2 in Miami. Please let us know whether he is available on this date.\

Thank you,
Lena

Lena Streisand | Associate
Jeffer Mangels Butler & Mitchell LLP | JMBM
1900 Avenue of the Stars, 7th Floor, Los Angeles, CA 90067
D: (310) 785-5398 | **F:** (310) 203-0567 | **E:** LStreisand@JMBM.com

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From: Heather Padron <Hpadron@aatriallaw.com>
Sent: Wednesday, May 14, 2025 1:57 PM
To: elio.martinez@gray-robinson.com; francesca.russo@gray-robinson.com; Gregory Cordrey <GCordrey@JMBM.com>; Stan M. Gibson <SMG@JMBM.com>; Celine Ohanian <COhanian@jmbm.com>; Lena Streisand <LStreisand@jmbm.com>; Marissa Sommer <MSommer@jmbm.com>; Itzi Munoz <IMunoz@jmbm.com>; Jessica.Santana@gray-robinson.com; lfowler@bushross.com; Lauren Watt <lwatt@sternekessler.com>; tduyton@sternekessler.com; Paige Cloud <pcloud@sternekessler.com>; Marissa Sommer <MSommer@jmbm.com>
Cc: SRG003-AAteam <SRG-AAteam@aatriallaw.com>; ahenry@riveromestre.com; jmistre@riveromestre.com; dbanker@bushross.com; ueverett@sternekessler.com; mspecht@sternekessler.com; jtuminar@sternekessler.com; hwgurland@duanemorris.com; aesnedeker@duanemorris.com; MSYungwirth@duanemorris.com; DM-ATT-Hernandez@duanemorris.com
Subject: Hernandez, et al. v. Stingray Group Inc., et al | Service

Counsel,

Please see attached for service Defendants' Notice of Deposition Under Rule 30(B)(1).

Thank you,

Heather Padron

ALAVI & ANAIPAKOS PLLC, *Paralegal*
609 Main Street, Suite 3200
Houston, Texas 77002
T 713.751.2374 | F 713.751.2341 | W aatriallaw.com

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EXHIBIT E

Subject: Estimate on Damages

Date: Monday, May 5, 2025 at 2:05:05 PM Central Standard Time

From: Edwin Hernandez <edwinhm@gmail.com>

To: Walter Bratic <Walter.Bratic@whitleypenn.com>

CC: M.A. Herrera <M.A.Herrera@whitleypenn.com>, Justin Blok <Justin.Blok@whitleypenn.com>, Kaelan Blok <Kaelan.Blok@whitleypenn.com>

Hi Walt,

I have an investor interested in the case and he would like to know if damages, ball-park where they will be. Are we thinking, millions, dozens of millions, or hundreds? It doesn't need to be precise but a range will suffice.

Regards,
Edwin

EXHIBIT F

Subject: RE: Deposition of David Hartmann [JMBM-LA.84711.0001]
Date: Saturday, May 24, 2025 at 8:39:41 AM Central Standard Time
From: Lena Streisand <LStreisand@jmbm.com>
To: Edwin Hernandez <edwinhm@gmail.com>
CC: Stan M. Gibson <SMG@JMBM.com>, Gregory Cordrey <GCordrey@JMBM.com>

Hi Dr. Hernandez,

Stingray confirmed that they will provide us with the option to attend the deposition by Zoom, so we will not need to travel to Miami.

Lena Streisand | Associate
Jeffer Mangels Butler & Mitchell LLP | JMBM
1900 Avenue of the Stars, 7th Floor, Los Angeles, CA 90067
D: (310) 785-5398 | **F:** (310) 203-0567 | **E:** LStreisand@JMBM.com

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From: Edwin Hernandez <edwinhm@gmail.com>
Sent: Friday, May 23, 2025 10:15 AM
To: Lena Streisand <LStreisand@jmbm.com>
Cc: Stan M. Gibson <SMG@JMBM.com>; Gregory Cordrey <GCordrey@JMBM.com>
Subject: Re: Deposition of David Hartmann [JMBM-LA.84711.0001]

David just wrote the mobile app, and signed NDAs I don't think travel is necessary, but if you'd recommend so you can meet stingray counsel that'll be fine to go forward with travel

On Fri, May 23, 2025, 11:12 Lena Streisand <LStreisand@jmbm.com> wrote:

Hi Dr. Hernandez,

Stingray notified us that they intend to move forward with David Hartmann's deposition in Miami on May 29. I am available to travel to Miami for the deposition. The cost for travel expenses would be approximately \$1,500. I would arrive in Miami the day before the deposition and plan to leave on the redeye the night of May 29. I do not bill for my travel time, only for time worked (i.e., preparing for and attending the deposition).

Please let us know if you approve this cost. Alternatively, we can ask local counsel to cover the deposition.

Thank you,
Lena

Lena Streisand | Associate
Jeffer Mangels Butler & Mitchell LLP | JMBM
1900 Avenue of the Stars, 7th Floor, Los Angeles, CA 90067

D: (310) 785-5398 | **F:** (310) 203-0567 | **E:** LStreisand@JMBM.com

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EXHIBIT G

Subject: RE: for our call today- tech expert check list-= patents
Date: Tuesday, April 1, 2025 at 9:29:24 AM Central Standard Time
From: Walter Bratic <Walter.Bratice@whitleypenn.com>
To: Edwin Hernandez <edwinhm@gmail.com>, Justin Blok <Justin.Blok@whitleypenn.com>, cordrey@jmbm.com <cordrey@jmbm.com>, sgibson@jmbm.com <sgibson@jmbm.com>, Gibson, Stan <smg@jmbm.com>
Attachments: image001.jpg, image002.png

Also, just a note that opposing counsel will have a hard time disparaging us since we have worked for them in the past.

From: Edwin Hernandez <edwinhm@gmail.com>
Sent: Monday, March 31, 2025 9:39 PM
To: Justin Blok <Justin.Blok@whitleypenn.com>; Walter Bratic <Walter.Bratice@whitleypenn.com>; cordrey@jmbm.com; sgibson@jmbm.com; Gibson, Stan <smg@jmbm.com>
Subject: Re: for our call today- tech expert check list-= patents

Thanks, we will discuss.

From: Justin Blok <Justin.Blok@whitleypenn.com>
Date: Monday, March 31, 2025 at 8:36 PM
To: Edwin Hernandez <edwinhm@gmail.com>, Walter Bratic <Walter.Bratice@whitleypenn.com>, "cordrey@jmbm.com" <cordrey@jmbm.com>, "sgibson@jmbm.com" <sgibson@jmbm.com>, "Gibson, Stan" <smg@jmbm.com>
Subject: RE: for our call today- tech expert check list-= patents

Edwin,

You are correct that Raein just started with our group as an Associate (new grad) and I did notice his father's firm is representing the defendant. We have dealt with similar issues in the past. We will ensure Raein does not touch this case and we will restrict his access to any information from this case (i.e., he will not be able to access the case folder on our shared drive).

Let me know if you are still worried about this issue.

Thanks,

Justin Blok

From: Edwin Hernandez <edwinhm@gmail.com>
Sent: Monday, March 31, 2025 6:27 PM
To: Walter Bratic <Walter.Bratice@whitleypenn.com>; cordrey@jmbm.com; sgibson@jmbm.com; Gibson, Stan <smg@jmbm.com>
Cc: Justin Blok <Justin.Blok@whitleypenn.com>
Subject: Re: for our call today- tech expert check list-= patents

Hi Walt,

There is a potential issue with your firm, Raein Anjom is the son of defendant's counsel. He does not figure on your webpage, is there a way to isolate and ensure no conversations, or any access is vacillated to him? It is a concern, please advise.

I believe this is his linkedin <https://www.linkedin.com/in/raein-anjom-014766250/> but since he is not on your directoyr, I wonder what is his role?

Regards,

Edwin

From: Walter Bratic <Walter.Bratic@whitleypenn.com>

Date: Friday, March 28, 2025 at 11:34 AM

To: Edwin Hernandez <edwinhm@gmail.com>, "cordrey@jmbm.com" <cordrey@jmbm.com>, "sgibson@jmbm.com" <sgibson@jmbm.com>, "Gibson, Stan" <smg@jmbm.com>

Cc: Justin Blok <Justin.Blok@whitleypenn.com>

Subject: for our call today- tech expert check list== patents

For our call today--- will explain... thanks

Walt Bratic



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EXHIBIT :

Subject: Payment Information for JAMS, Inc.

Date: Tuesday, June 3, 2025 at 7:54:43 AM Central Standard Time

From: billpay@paymentus.com <billpay@paymentus.com>

To: edwinhm@gmail.com <edwinhm@gmail.com>



Payment Information for JAMS, Inc.

Dear EDWIN HERNANDEZ,

We are pleased to confirm your payment with JAMS, Inc. Below is the summary of your payment transaction. Your payment has been received and will be reflected in your account. Thank you for your continued relationship with JAMS, Inc.

JAMS reference number: **1220076593**

Confirmation number: **1909199593**

Invoice number: (if applicable) **7543668**

Payment date: **Jun 03, 2025**

Payment amount: **6,950.00**

Processing fee: **207.81**

Total amount charged: **7,157.81**

Total invoice amount: (if applicable) **6,950.00**

Contact Information

First name: **EDWIN**

Last name: **HERNANDEZ**

Daytime phone number: **(561)306-4996**

Email: **edwinhm@gmail.com**

Account Information

Payment type: **Invoice**

Zip code: **33076**

Payment method: **Credit Card**

Date due: **Upon Receipt**

Payment Method Information

Card type: **MasterCard**

Card number: *******8320**

Card holder name: **EDWIN HERNANDEZ**

